

13 March 2025

New Zealand Government
Attn: Ilana Miller
Via Portal

Tēnā koe Ilana

Response to request for further information for referral of the Ashbourne project under the Fast-track Approvals Act 2024

Thank you for your letter, circulated on 4 March 2025, which set out a request for further information arising from your review of the referral application for the Ashbourne project. The request is as follows:

Please demonstrate how the benefits of the project would be regionally or nationally significant, as required by section 22(1)(a) of the Act.

Executive Summary

This response demonstrates how the benefits of the project would be regionally significant, as required by Section 22(1)(a) of the Fast-track Approvals Act 2024. This response will be structured as follows:

- Our interpretation of 'regionally significant';
- Ashbourne within the context of the Waikato region; and
- How Ashbourne and its benefits would be regionally significant.

Regionally Significant

Based on our planning knowledge and interpretation of 'regional significance', we consider it to mean an activity in the region that is able to generate meaningful benefits of a regional scale. This may include social, economic, environmental or cultural benefits; however, they need to be beneficial beyond the immediate locality and facilitate the delivery of infrastructure and development at pace.

With this in mind, it is critical to consider any project within its context. In this case, it is Matamata (tier 3 jurisdiction) within the Waikato region, which cannot be fairly compared to Hamilton (tier 1 jurisdiction) within the Waikato region.

It's our professional view that Ashbourne is a regionally significant project.

It will deliver:

- Circa 520 residential units;
- Circa 218 retirement living units;

- Two solar farms with capacity to 8,000 homes.
- Neighbourhood commercial precinct.
- Large greenway, which balances stormwater management with ecological betterment, that will incorporate thousands of trees and plants.

This will be further outlined in the subsequent sections.

Ashbourne

Ashbourne has been developed for Matamata's demographic by delivering retirement living, specifically for the ageing population; housing variety to support affordable housing supply and residential options; and an overall necessary delivery of housing to the market in Matamata. It is this context that determines why Ashbourne is a regionally significant project that will deliver regionally significant benefits, specifically for the community of Matamata.

Based on the 2023 Census, compared to the Waikato region and New Zealand overall, the community of Matamata are:

- Significantly older, with a median age of 47 in comparison to the regional and national average of 39;
- Less likely to be in employment or studying;
- Less likely to hold a bachelor's degree or higher qualification, and more likely to have no qualifications;
- Likely to earn lower incomes on average;
- More likely to be of European ethnicity and born in New Zealand;
- More likely to be owner-occupiers and less likely to be renting; and
- Living in larger homes, but with fewer people per household.

Regionally Significant Benefits of Ashbourne

The benefits of the Ashbourne project would be regionally, and in some cases nationally significant, as:

- The project will generate a wide range of economic benefits that will be regionally significant, including but not limited to:

Ashbourne Project

- In the next fifteen years, the project will support employment levels in the region, specifically for the construction industry.

Through consenting and design, the project will generate a number of jobs, that require expertise beyond the immediate locality of Matamata, including from the Bay of Plenty, Waikato, and Auckland. This is anticipated to be ongoing as the project moves to detailed design, particularly as this is a staged development proposal.

The number of jobs generated will then increase once construction of the project begins. Given the scale of the project, construction workers will be required from outside of the immediate locality of Matamata, from the wider Waikato and Bay of Plenty area.

As outlined in the supporting economics assessment, included as **Attachment 1**, during construction Ashbourne will generate approximately 2,175 full-time equivalent jobs. This is made up of 640 direct jobs and 1,534 indirect jobs. This is a significant number of jobs for a rural town in the Waikato region, and it will require expertise on a regional scale, particularly for roles that require a qualification such as engineers (as the 2023 Census indicates residents in Matamata are less likely to hold a bachelor's degree or higher qualification).

- Once operational, the project will generate long-term employment through the solar farms, retirement village with associated ancillary services and the commercial node that will support ongoing economic generation (and indirectly encourage relocation to Matamata). This provides diversity in employment opportunities, from aged care workers to hospitality workers.

As outlined in the supporting economics assessment, included as **Attachment 1**, this will support more than 60 permanent full-time equivalent jobs, that will help diversify local employment opportunities in Matamata and provide a steady source of economic activity beyond the initial construction phase.

- Once completed, the project will accommodate a range of affordable housing options that will total circa 520 residential units and 218 retirement living units that will support business development in Matamata through an anticipated increase in residents in Matamata. With this will come, new businesses, increased employment opportunities, and increased spending within the Waikato region.

Residential

- The development of circa 520 residential units provides an opportunity for greater residential choice in terms of location, accessibility and typology that will support additional residential capacity and respond to the local, regional and national housing shortage. Given the current housing market, with high demand and low supply, this will provide for a range of housing typologies that are high-quality, safe and warm for a significant number of people, now and into the future.

As outlined in the supporting economics assessment, included as **Attachment 1**, a Housing Capacity Assessment has been prepared for Matamata that identifies a long-term shortfall in housing supply, however considers sufficient supply in the short-term. Insight Economics considers there is a shortfall in the short-term, as set out in the supporting economics assessment, included as **Attachment 1**.

Further to the above, in the supporting economics assessment, included as **Attachment 1**, Insight Economics' analysis confirms that Matamata-Piako District Council is unlikely to be meeting their housing capacity obligations under the National Policy Statement for Urban Development ('NPS-UD') and for this reason, Ashbourne represents a substantial boost in housing supply for Matamata to support the regional and national housing shortfall. As outlined on Page 5 of the supporting economics assessment, included as **Attachment 1**, *"that the 520 dwellings and 218 retirement units envisaged by the proposal represent an extremely significant increase in development capacity for the purposes of the NPS-UD"*.

Retirement Village

- The development of circa 218 retirement living units provides essential housing for the ageing population of Waikato and New Zealand. This has a significant benefit, both regionally and nationally, as the number of residents aged 75 and over is projected to grow by 138% in the catchment over the next 30 years. The economic assessment, provided by Insight Economics and appended as *Attachment 12*, to the referral application identified an unmet demand of approximately 1,200 retirement village units over the long term; which this project directly responds to.
- The provision of housing specifically for the ageing population means that the general housing market is freed up for others, which directly responds on a regional and national level to the shortfall in the housing market.

Solar Farms

- As outlined in the economic assessment, provided by Insight Economics and appended as *Attachment 12*, the capital investment required for solar farms results in improvements to regional infrastructure, such electrical grid connections, that support regional economic growth.
- Within the project, the two solar farms have capacity to power approximately 8,000 homes, which support both a regional and national reduction in energy costs. Solar farms lower electricity prices by increasing the supply of renewable energy, making energy more affordable for homes and businesses.
- The project will generate a wide range of social and cultural benefits that will be regionally and nationally significant, including but not limited to:
 - The project delivers circa 520 residential units and circa retirement living units that responds to the national housing shortage, by providing a range of housing typologies that are high quality, safe and warm for a significant number of people, now and into the future.
 - Through consultation with Mana Whenua, the project will incorporate cultural values into the design to ensure the regional and national cultural narrative of Mana Whenua are reflected in the development. This may include Ngāti Hauā and Ngāti Hinerangi pūrakau, art, and taonga, using Ngā Iwi-endorsed artists, indigenous planting schemes, and cultural naming.
 - Within the retirement village are a number of aged care facilities, including a hospital with 71 beds, which will provide necessary medical care to the region. This is a significant regional benefit as there are limited care facilities in Matamata and the rural communities of Waikato. Pohlen Hospital is located within Matamata, however this is limited to 33 private beds. Waikato Hospital is the largest and nearest public hospital, however this is approximately 60 kilometres from the site.
- The project will generate a wide range of environmental benefits that will be regionally and nationally significant, including but not limited to:
 - The project directly responds to the national risk of climate change and natural hazards through the management of flooding hazards, via the stormwater management provided by the greenway, and the incorporation of measures to support the reduction of greenhouse gas emissions, such as renewable electricity generation and promotion of walking and cycling.

- The project integrates effectively with adjacent ecologically sensitive areas while reintroducing biodiversity into a relatively barren landscape. The project avoids encroachment on natural wetland areas and incorporates stormwater detention devices alongside the greenway with native plantings, contributing to a positive ecological outcome. This will support the environmental outcomes within the immediate locality, but also on a regional scale due to the location of the site to the Waitoa River which stems into the Piako River that is part of the Piako Catchment.
- By preserving the natural wetlands, the project maintains critical habitat, supports biodiversity, and safeguards natural water filtration processes to benefit the region. The inclusion of stormwater management features helps mitigate runoff, capture sediment, and facilitate bioremediation, improving water quality. Additionally, greenways with native plantings enhance regional ecosystems by creating wildlife corridors, improving air quality, and moderating urban temperatures.

Conclusion

To conclude, as outlined above, Ashbourne delivers benefits of regional significance that demonstrate why this project should be referred under the Fast-track Approvals Act 2024. Given the locality of Matamata, Ashbourne is a significant project for the region which will enable substantial job opportunities, deliver nationally needed housing supply, generate major economic revenue, and establish a well-functioning urban development for future residents and the community of Matamata.

We trust that the above addresses your query, however please do not hesitate to contact us should you require any further information.

Yours sincerely | Nā māua noa, nā

Barker & Associates Limited



Grace Forno
Senior Planner
s 9(2)(a)



Fraser McNutt
Partner
s 9(2)(a)